

**EXHIBIT A**

Proposed Order

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

CELSIUS NETWORK LIMITED,  
Plaintiff

v.

STAKEHOUND SA,  
Defendant

Chapter 11

Case No. 22-10964 (MG)

Adversary Proceeding  
No. 23-01138 (MG)

**[PROPOSED] ORDER GRANTING DEFENDANT STAKEHOUND SA's  
EMERGENCY MOTION FOR AMENDMENT OF ORDER GRANTING TRO**

<sup>1</sup> The Debtors in these chapter 11 cases (the "Chapter 11 Cases"), along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network, Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The Debtors' service address in these Chapter 11 Cases is 121 River Street, PH05, Hoboken, New Jersey (07030).

Upon the motion (the “**Motion**”)<sup>2</sup> dated September 15, 2023 [ECF No. [●]], of StakeHound S.A., the defendant in the above-captioned adversary proceeding, for entry of an order amending the TRO Order, all as more fully set forth in the Motion; and the Court having determined that the legal and factual bases set forth in the Motion and the Second Castellana Declaration, and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The TRO Order is hereby amended as set forth herein.
2. Article IV of the TRO Order shall be deleted and replaced in its entirety as follows:

For the reasons discussed herein, the Court GRANTS the Motion for a Temporary Restraining Order (“TRO”).

STAKEHOUND, AND ALL PERSONS ACTING IN CONCERT WITH STAKEHOUND, ARE HEREBY PROHIBITED AND PRELIMINARILY ENJOINED FROM TRANSFERRING ANY SUBJECT PROPERTY TO ANY PERSON OR ENTITY PENDING THE OUTCOME OF THE PRELIMINARY INJUNCTION HEARING, WHICH, WITH THE AGREEMENT OF COUNSEL, WILL BE HEARD BY THE COURT ON SEPTEMBER 27, 2023 AT 9:00 AM. Notwithstanding the terms of this TRO, StakeHound shall be permitted to spend \$500,000 in money or money’s worth of the Subject Property between now and the PI Hearing.

“Subject Property” shall mean Native Tokens and Staking Rewards held by StakeHound. For the avoidance of doubt, the restrictions set forth in this TRO shall not apply to StakeHound’s cash on hand.

3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Dated: \_\_\_\_\_, 2023  
New York, New York

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HONORABLE MARTIN GLENN  
CHIEF UNITED STATES BANKRUPTCY JUDGE

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.